

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE EXPORT-IMPORT BANK OF THE REPUBLIC OF :
CHINA, :

13 Civ. 1450 (HB)

Plaintiff/Judgment Creditor, :

- against - :

GRENADA, :

Defendant/Judgment Debtor. :

GMO TRUST, on behalf of its series GMO EMERGING :
COUNTRY DEBT FUND, GMO EMERGING :
COUNTRY DEBT L.P., GMO EMERGING COUNTRY :
DEBT INVESTMENT FUND PLC, GREYLOCK :
GLOBAL OPPORTUNITY MASTER FUND LTD., and :
FRANKLIN TEMPLETON EMERGING MARKET :
DEBT OPPORTUNITIES FUND PLC, :

Intervenors/Defendants. :
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**DECLARATION OF BOAZ S. MORAG
IN SUPPORT OF DEFENDANT GRENADA'S OPPOSITION TO
THE EXPORT-IMPORT BANK OF THE REPUBLIC OF CHINA'S
MOTION TO COMPEL GRENADA'S RESPONSE TO PLAINTIFF'S
FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT**

Pursuant to 28 U.S.C. § 1746, Boaz S. Morag declares as follows:


1. I am an attorney admitted to practice before this Court and Counsel at Cleary Gottlieb Steen & Hamilton LLP ("Cleary Gottlieb"), attorneys for defendant Grenada in this matter. I submit this declaration on behalf of Grenada in support of its Opposition to the Export-Import Bank of the Republic of China's Motion to Compel Grenada's Response to Plaintiff's First Set of Document Requests to Defendant.

2. Attached to this declaration as Exhibits 1-9 are true and correct copies of the following documents:

- | <u>Ex.</u> | <u>Document</u> |
|------------|---|
| 1. | Order, <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Nov. 6, 2009); |
| 2. | Hr'g Tr., <i>NML Capital, Ltd. v. Republic of Argentina</i> , No. 03 Civ. 8845 (TPG) (S.D.N.Y. Nov. 4, 2009) (excerpts); |
| 3. | Complaint, <i>The Exp.-Imp. Bank of the Republic of China v. Grenada</i> , No. 06-cv-2469(HB) (S.D.N.Y. Mar. 29, 2006); |
| 4. | Answer, <i>The Exp.-Imp. Bank of the Republic of China v. Grenada</i> , No. 06-cv-2469(HB) (S.D.N.Y. June 26, 2006); |
| 5. | Offering Memorandum, <i>Grenada Offer to Exchange New Bonds for Eligible Claims</i> , dated Sept. 9, 2005; |
| 6. | "Grenada to Commence discussions with Creditors on the Restructuring of its Public Debt," <i>GOV.gd</i> (Mar. 8, 2014); |
| 7. | "IMF Mission Reaches Staff-Level Agreement with Grenada on an Economic Program under the Extended Credit Facility," <i>International Monetary Fund</i> (Mar. 14, 2014); |
| 8. | The Export-Import Bank of the Republic of China's Responses and Objections to Defendant Grenada's First Request for Production of Documents to Plaintiff, dated June 3, 2014; |
| 9. | Email from Jacob Johnston to Paul Summit and attached confidentiality agreement, dated May 29, 2014. |

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17, 2014 in New York, New York.


BOAZ S. MORAG